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February 3, 2010

VIA E-MAIL
hugh.marbury@dlapiper.com

Hugh J. Marbury
DLA Piper LLP
The Marbury Building
6225 Smith Avenue
Baltimore, Maryland 21209-3600

Re: *MetroPCS Wireless, Inc. v. TeleCommunication Systems, Inc.*, No. 1:09-cv-00601
MetroPCS Document Production

Dear Hugh:

We strongly disagree with the accusations contained in your letter of January 29, 2010.

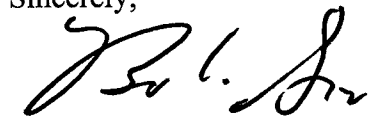
On more than one occasion, you stated to me that it was easy for MetroPCS to produce documents because all MetroPCS needed to do was to provide what had already been produced in the underlying Texas litigation. We produced to you what you requested and what TCS would need to provide the defense it was ordered to provide. The documents were produced in the same manner as they were produced in the underlying Texas litigation.

MetroPCS has fully complied with its obligations and has not engaged in excessive discovery or evasion. In fact, had MetroPCS not produced all of the documents, MetroPCS believes you would have complained that something was withheld.

To address your points, the prior art is generally found at MPCS-0000001-MPCS-0007462. Although the invalidity contentions do not relate to any pending issue, we will produce them shortly. The infringement contentions specifically recite the PDE, which is provided by TCS. The infringement contentions are found at MPCS-0553031-MPCS-0553321 and MPCS-0553328-MPCS-0553381. You have the costs and expenses as they are at issue before the AAA panel. The East Texas claim construction process has not finished, but what few documents have been served will be produced. When claim construction briefing begins, it is publicly available on Pacer.

As always, please do not hesitate to contact me if you have any questions, comments, or concerns. Thank you.

Sincerely,



Brett C. Govett